

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

In re PEGASYSTEMS INC. SECURITIES
LITIGATION

) No. 1:22-cv-11220-WGY
)
) LEAD PLAINTIFFS' UNOPPOSED
MOTION FOR: (1) PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT; (2) CLASS
CERTIFICATION FOR SETTLEMENT
PURPOSES; AND (3) APPROVAL OF
NOTICE TO THE SETTLEMENT CLASS

Pursuant to Federal Rule of Civil Procedure 23, Lead Plaintiffs Central Pennsylvania Teamsters Pension Fund - Defined Benefit Plan, Central Pennsylvania Teamsters Pension Fund - Retirement Income Plan 1987, and Construction Industry Laborers Pension Fund (collectively, “Lead Plaintiffs”) hereby move this Court for entry of an order: (i) preliminarily approving the proposed settlement of this litigation (the “Settlement”); (ii) preliminarily certifying the Settlement Class for settlement purposes; (iii) approving the proposed form and manner of providing notice of the proposed Settlement to the Settlement Class; and (iv) setting a hearing date for the Court to consider final approval of the Settlement, approval of the Plan of Allocation of the Net Settlement Fund, Lead Counsel’s application for attorneys’ fees and expenses, and Lead Plaintiffs’ applications for awards pursuant to 15 U.S.C. §78u-4(a)(4), as well as a schedule for deadlines relevant thereto.¹ Attached is a [Proposed] Order Preliminarily Approving Settlement and Providing for Notice.

DATED: April 23, 2024

Respectfully submitted,

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/s/ Debra J. Wyman

DEBRA J. WYMAN

¹ All capitalized terms not otherwise defined shall have the meanings ascribed to them in the Stipulation of Settlement (the “Stipulation”) dated April 23, 2024, submitted herewith.

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Liaison Counsel for Lead Plaintiffs

LOCAL RULE 7.1(a)(2) CERTIFICATION

I hereby certify that counsel for Lead Plaintiffs conferred with counsel for Defendants on the matter set forth herein, who do not oppose this Motion.

/s/ Debra J. Wyman

DEBRA J. WYMAN

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 23, 2024.

/s/ Debra J. Wyman

DEBRA J. WYMAN